

EXHIBIT B

8/21/2018

Frazier Deps - mweisberg@weisberglawoffices.com - Weisberg Law, P.C. Mail

Christopher Rider
to me, Brian, Gary, Anthony

All,

As a follow-up to my conversation with Gary and Brian last Friday, please consider this email a formal response to your requests for production, which I'm assuming are identical to the emails below. If you've included additional document requests in the paper copy, let me know and I'll respond to those as well.

I'm objecting to producing "(1) All narcotics property receipts that have been created and/or filed since Boyle and Evers took over in March, 2017, and in particular, without limitation, all of those that classify the source of the narcotics as "on the highway" or that classifies them as an "investigative object." (2) The actual criminal complaint form that is associated with the property receipt, as well as all PARS and other documents or evidence in possession, custody or control of the department, including all narcotics allegedly noted." This a voluminous request, and doesn't make any fact at issue in this case more or less probable. Your clients objected to the flipping process outlined in the garage meeting. That process, which is further outlined in Evers' draft SOP, contemplates flipping only when approved by Narcotics inspectors. I've produced to you the four occasions that we're aware of where flipping took place. The rest of this is a fishing expedition that doesn't have any real bearing on the case at hand—whether your clients were retaliated against for their opposition to Boyle and Evers' flipping proposal.

As for request 3, you now have the names of the officers involved in the four identified flipping incidents. I've redacted the names of the arrestees due to safety concerns, but you have the DC numbers as well, so you could find them if you really wanted to.

Finally, I'm going to object to your document request for the IA investigations. They are not closed yet. Once closed, I'll happily turn them over.

Please note that I'll be on vacation for the next week and a half, but should have my cellphone should anyone need to reach me.

.Chris